



MEMO ENDORSED

MURIEL GOODE-TRUFANT
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**THE CITY OF NEW YORK
LAW DEPARTMENT**

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Wednesday, January 15, 2025

Via ECF

Honorable Dale E. Ho
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application GRANTED IN PART. The parties shall adhere to the briefing schedule set forth below. SO ORDERED. The Clerk of Court is respectfully directed to terminate ECF No. 90.

Dated: January 24, 2025
New York, New York

Dale E. Ho
United States District Judge

Re: Chinchilla v. City of New York, et al.,
Civil Action No.: 1:23-cv-08986-DEH

Dear Judge Ho:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, assigned to represent the City of New York (“Defendant”) in the above-referenced matter. I write jointly, on behalf of both parties, to respectfully request a thirty-day extension of the deadlines set forth in the briefing schedule so-ordered by the Court on November 19, 2024. *See* ECF Dkt. No. 89. This is the first request for this relief.

This extension is requested in light of the parties’ heavy caseloads, including multiple federal and state actions that are currently in discovery and in motion practice. Additionally, the transcript of the last deposition in this matter, which was taken on December 17, 2024, was delivered to the parties on January 10, 2025, and the parties need additional time to review and finalize it.

Accordingly, the parties respectfully request that the Court endorse the following revised schedule:

Defendant	Motion for Summary Judgment	February 20, 2025 March 3, 2025	20 pages
Defendant	Opposition/Reply	March 20, 2025 April 4, 2025	15 pages
Plaintiff	Motion for Summary Judgment	February 20, 2025 March 3, 2025	20 pages
Plaintiff	Opposition/Reply	March 20, 2025 April 4, 2025	15 pages

We thank the Court for its consideration of these requests.

Respectfully submitted,

/s/
Marina Sukonnik
Assistant Corporation Counsel

CC: Christina Martinez Esq., by ECF & Email